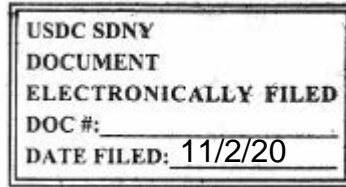


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November 2, 2020

VIA ECF

Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *U.S.A. v. Gordon*, 1:20-cr-00054-AJN

Dear Judge Nathan:

I write with the consent of the Government to request an extension of the pre-trial motions deadline, currently November 6, 2020, in the above-referenced matter.

I was appointed to represent Tafari Gordon (“RasTafari Bey”) on September 3, 2020. With the Government’s consent, I previously requested and received an adjournment of the trial date in this matter. The parties are scheduled to appear for a pretrial conference on December 18, 2020 and trial is scheduled in this matter for January 4, 2020.

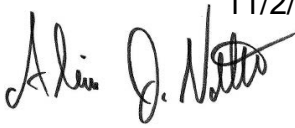
On September 30, 2020, the Court so-ordered a jointly proposed pre-trial schedule submitted by the Government. Doc. No. 43. According to the pre-trial schedule, any 404(b) motions or motions *in limine* must be filed by November 6, 2020.

Recently, the parties have engaged in discussions about a potential pre-trial resolution to this matter. The parties are seeking additional necessary information regarding Rastafari Bey’s criminal history in furtherance of a possible disposition.

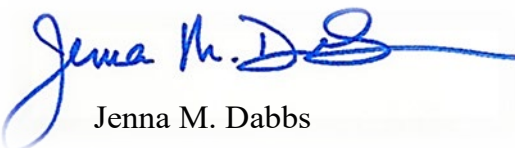
Given our joint, ongoing effort to determine whether this matter can be resolved without proceeding to trial, we ask that the Court extend the upcoming motions deadline from November 6, 2020 to November 20, 2020. If the Court grants the requested extension, the parties will use the additional time to continue discussing a potential resolution, which may make motions unnecessary in this matter. If for any reason the parties are not able to resolve this matter pre-trial, the proposed extension would not require an adjournment of the scheduled trial date as briefing would conclude by December 4, 2020, one month before trial.

We ask that the Court extend the motions deadline to November 20, 2020, the deadline for oppositions to November 27, 2020 and the deadline for replies to December 4, 2020. The Government joins in this request.

SO ORDERED.

11/2/20  
  
SO ORDERED.  
ALISON J. NATHAN, U.S.D.J.

Respectfully submitted,

  
Jenna M. Dabbs

cc: Jacob Gutwillig / Elizabeth Espinosa  
Assistant United States Attorneys  
(by email)